

Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION
CHARLENE CARTER)
)
) CIVIL ACTION NO.
VS.) 3:17-CV-02278-X
)
SOUTHWEST AIRLINES CO., AND)
TRANSPORT WORKERS UNION OF)
AMERICA, LOCAL 556)

CONFIDENTIAL
TWU LOCAL 556 30(b)(6)
ORAL DEPOSITION OF
JESSICA PARKER
NOVEMBER 30, 2020

ANSWERS AND DEPOSITION OF JESSICA PARKER,
produced as a witness at the instance of the
Plaintiff, taken in the above-styled and -numbered
cause on NOVEMBER 30, 2020, at 4:13 p.m., before
CHARIS M. HENDRICK, a Certified Shorthand Reporter
in and for the State of Texas, witness located in
Loveland, Colorado, pursuant to the Federal Rules
of Civil Procedure, the current emergency order
regarding the COVID-19 State of Disaster, and the
provisions stated on the record or attached hereto.

Page 2

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ALSO PRESENT: MS. CHARLENE CARTER
MS. LAUREN ARMSTRONG

Page 3

INDEX

1	
2	Appearances2
3	JESSICA PARKER
4	Examination by Mr. Gilliam.....4
5	
6	Signature and Changes.....37
7	Reporter's Certificate.....39
8	

EXHIBITS

9	
10	Exhibit 28 -12
	Union Business Confirmed Travel Request Form,
11	Document 41
12	Exhibit 29 -17
	TWU Women Take Action Nationwide Article,
13	Document 14
14	Exhibit 30 -30
	Facebook Posts TWU Local 556,
15	Documents 25(a) & 25(b)
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

Page 4

PROCEEDINGS

2 THE REPORTER: Today's date is
3 November 30, 2020. The time is 4:13 p.m. This is
4 the 30(b)(6) deposition of Jessica Parker, and it
5 is being conducted remotely in accordance with the
6 current emergency order regarding the COVID-19
7 State of Disaster. The witness is located in
8 Laughlin, Colorado.

9 My name is Charis Hendrick, Court
10 Reporter, CSR No. 3469. I am administering the
11 oath and reporting the deposition remotely by
12 stenographic means from my home in Ellis County,
13 Texas.

14 JESSICA PARKER,
15 having been first duly sworn, testified as follows:

EXAMINATION

17 BY MR. GILLIAM:

18 Q. Good afternoon, Ms. Parker. Do you
19 realize you are here today testifying on behalf of
20 Local 556 and not in your personal capacity?

21 A. Yes.

22 Q. Okay. And prior to this deposition, did
23 you review any documents in preparation?

24 A. No, I did not.

25 Q. Okay. And apart from legal counsel, did

Page 5

1 you have any --
2 **A. Excuse me. I received the -- the Subpoena**
3 **-- or the deposition -- the document that had the**
4 **items that you were going to be addressing.**
5 Q. Okay.
6 **A. That's all.**
7 Q. No other documents, though?
8 **A. No.**
9 Q. Okay. And apart from legal counsel, did
10 you have any communications with anybody in
11 preparation for this deposition?
12 **A. No. Not apart from legal counsel.**
13 Q. Okay. And I don't want to know about
14 those. And do you hold any union committee
15 positions with TWU Local 556?
16 **A. I do.**
17 Q. And what are those positions?
18 **A. I am the chairperson for our scholarship**
19 **committee. I am also the chairperson for our**
20 **women's committee.**
21 Q. Okay. Do you hold any other positions
22 with Local 556?
23 **A. I am the Denver domicile executive board**
24 **member.**
25 Q. Okay. And is the Denver executive board

Page 6

1 member also called a DEBM?
2 **A. Yes, it is.**
3 Q. Okay. And how long have you been a DEBM?
4 **A. Almost six years. This is the end of my**
5 **second term; and the terms are three years each.**
6 Q. Okay. All right. And how long have you
7 been chair of the working women's committee?
8 **A. For four years.**
9 Q. Okay.
10 **A. I believe. If I am doing my math right,**
11 **four years.**
12 Q. Since around 2016?
13 **A. The -- towards the end of 2016, yes.**
14 Q. Okay. All right. And you -- you were
15 involved in planning the union's participation in
16 the January 2017 women's march, correct?
17 **A. Yes, I was.**
18 Q. Okay. And what -- was it your idea to, I
19 guess, plan the -- Local 556's participation in
20 that march?
21 **A. Yes.**
22 Q. Okay. And, I guess, how did you learn
23 about the women's march?
24 **A. I -- I don't remember specifically how I**
25 **learned about it. I mean, it was -- it was kind of**

Page 7

1 **all over the place, so on social media and --**
2 Q. Okay. And did -- now, the working --
3 working women's committee is allocated a budget; is
4 that correct?
5 **A. Yes.**
6 Q. Okay. And did -- in planning for the
7 women's march, did you ask for any additional, I
8 guess, money from the executive board in order to
9 participate?
10 **A. No, I did not.**
11 Q. Okay. So you -- you just used the funds
12 that were allocated to plan the march -- or your
13 participation in the march?
14 **A. I operated within my budget, yes.**
15 Q. Okay. And do you know if the
16 International was involved in the women's march in
17 any -- in any way?
18 **A. Gwen York, who is deceased, but she**
19 **facilitated the meeting that we had at TWU**
20 **International. I don't know of any of their**
21 **involvement in any other capacity.**
22 Q. Okay. And does the International also
23 have a working women's committee?
24 **A. Yes.**
25 Q. Okay. And the working women's committee

Page 8

1 is strictly a union committee, correct?
2 **A. Yes.**
3 Q. Okay. Is there any joint women's
4 committee between Southwest and the union?
5 **A. The company?**
6 Q. Yes.
7 **A. No.**
8 Q. Okay. Now, when -- when you decided that
9 you wanted to plan an event to, I guess, get Local
10 556 members to go to Washington, D.C. and
11 participate in the march, did you talk to Audrey
12 Stone about it?
13 **A. Yes. We communicated.**
14 Q. And what communications did you have with
15 Audrey Stone about the women's march?
16 **A. We coordinated for -- we had the meeting**
17 **at TWU International; I believe it was on January**
18 **19th. The march was on January 21st. And we**
19 **coordinated planning the meeting -- the agenda for**
20 **the meeting and lodging while we were there.**
21 Q. Okay. And did you have a written agenda
22 for the meeting?
23 **A. We did, yes.**
24 Q. Okay. And did you have a written agenda
25 for, I guess, all of the events that week?

Page 9

1 **A. No. Just for the -- just for the -- just**
2 **for the meeting at TWU International.**
3 Q. Okay. Now, prior to the event taking
4 place, did -- did you ask Audrey Stone for
5 authorization to organize the union's participation
6 in the event?
7 **A. I don't -- I don't know that I asked for**
8 **her authorization. We arranged -- there was -- we**
9 **arranged travel to and from. And I got approval**
10 **that we could -- because we were facilitating a**
11 **meeting while we were there, that we could use**
12 **union business travel. And I -- I got approval for**
13 **that, but I don't know -- I don't remember anything**
14 **other than that.**
15 Q. Okay. And you got the approval for union
16 business travel from Audrey Stone?
17 **A. I don't remember. I don't remember. I**
18 **think I initially emailed John Parrott and he**
19 **recommended that we check with Audrey, I believe is**
20 **how that happened. It's been four years ago, so I**
21 **don't remember exactly.**
22 Q. Okay. And how many union members ended up
23 attending the women's march?
24 **A. I -- if memory serves, I believe we had**
25 **28, but that is -- that is a rough guess. It's a**

Page 10

1 **close guess, but it's --**
2 Q. Okay. And did you decide who, I guess,
3 you would invite to attend the march?
4 **A. They were women who reached out that had**
5 **been involved in our union that showed -- that**
6 **expressed interest in going.**
7 Q. Now, of the women who expressed interest
8 in going, how did they learn that Local 556 was
9 going to participate in a women's march?
10 **A. I -- I don't recall how that all**
11 **transpired.**
12 Q. Okay. But the union members reached out
13 to you personally or --
14 **A. Some of them did, I think, but others were**
15 **-- I -- I honestly don't remember how -- I -- I**
16 **knew, of people who were going, there were several**
17 **board members who went, so I -- I probably found**
18 **out through some -- through -- through board**
19 **members.**
20 Q. Okay. And how -- do you know how they
21 went about getting authorization to attend?
22 **A. Well, there was no authorization to attend**
23 **-- to attend the march. We had -- we had to**
24 **arrange lodging. So, I guess, I don't understand**
25 **what you are asking.**

Page 11

1 Q. Did -- did the union members who wanted to
2 attend have to, I guess, request to be pulled in
3 order to attend?
4 **A. I believe there were a handful of trip**
5 **pulls. I don't know how many. John Parrott would**
6 **probably know that exactly because he handles the**
7 **pulls.**
8 Q. Okay. And who -- are there -- are there
9 particular forms that have to be submitted in order
10 to, I guess, to -- to be pulled?
11 **A. If memory serves, most people arrange --**
12 **either already were off of work or arranged to be**
13 **off of work. I -- I believe I submitted a handful**
14 **of people to -- I am assuming JP, with their trip,**
15 **their pairing number and the dates if it needed to**
16 **be pulled.**
17 Q. Okay. And when you say you submitted a
18 handful of people, did you submit particular forms?
19 **A. I -- at that time, our -- the way we have**
20 **done things, I believe, has changed since then. I**
21 **think I just emailed him names, employee numbers,**
22 **pairing number and dates.**
23 Q. Okay. Let's see. If I could have you
24 look at Document 41. We will mark this as, I
25 guess, Exhibit 28; is that where we are?

Page 12

1 THE REPORTER: Yes.
2 MR. GREENFIELD: And, Jessica, I
3 emailed you several of those. Did you -- did those
4 emails come through?
5 THE WITNESS: Yeah, I'm looking -- I
6 am having to look on my phone because -- so
7 Document 41?
8 Q. (By Mr. Gilliam) Yes, ma'am.
9 **A. Okay.**
10 **(Exhibit 28 marked.)**
11 **A. Okay.**
12 Q. (By Mr. Gilliam) Do you recognize this?
13 **A. Yes. These are -- I haven't done a pull**
14 **in so long. Oh, these are our -- these are the**
15 **travel requests. I am sorry. It's -- we haven't**
16 **been traveling, so -- yes. I recognize this.**
17 Q. Okay. And you said these are -- these are
18 Travel Request Forms?
19 **A. These are travel -- as titled on the top,**
20 **these are Travel Request Forms, yes.**
21 Q. Okay. Do you know if you submitted these
22 to John Parrott?
23 **A. I -- I could have. I don't know if I**
24 **submitted them or if they submitted them**
25 **themselves. I don't know.**

Page 13

1 Q. Okay. Do you know whether it's the
2 company or the union that generates the blank form
3 itself?
4 **A. I don't know --**
5 Q. Okay.
6 **A. -- where the form comes from.**
7 Q. Okay. And -- okay. And you don't know if
8 they are union forms?
9 **A. Well, it's -- I mean, it's a union form.**
10 **It says, Union Business Travel Request. I don't**
11 **know who -- you know, because it goes through the**
12 **company. I am assuming this is generated by our**
13 **union, but I have nothing to do with that, so I**
14 **wouldn't know.**
15 Q. Okay. And do you remember having any
16 communications about filling out these forms?
17 **A. I would imagine I had them, but I don't**
18 **remember those communications.**
19 Q. Okay. And when these forms are submitted,
20 do you know if Southwest has to authorize the
21 travel request?
22 **A. I don't know what the process is for how**
23 **they are authorized.**
24 Q. Okay. All right. Now, I guess, what --
25 what was -- now, what was your interest in having

Page 14

1 Local 556 participate in the women's march?
2 **A. As chair of the women's committee, I -- I**
3 **just thought it would be an important event for the**
4 **Local to be involved in. There were other unions**
5 **-- the Coalition of Labor Union Women and other**
6 **union organizations, AFL-CIO; there were other**
7 **labor groups involved with the march.**
8 Q. Okay. And besides labor groups, do you
9 know if there were other groups involved with the
10 march?
11 **A. I have no idea.**
12 Q. Okay. You don't know if any other groups
13 were involved in the march at all?
14 **A. Well, I don't know -- I mean, what -- I**
15 **don't understand your question. I am sure there**
16 **were a lot of groups, but I don't know -- I mean,**
17 **we were focused on the union aspect of it, so --**
18 Q. Do you know if the women's march had any
19 sponsors?
20 **A. Oh, they had a lot of sponsors.**
21 Q. Okay. Do you remember some of the
22 sponsors?
23 **A. The National Organization for Women was a**
24 **sponsor. I think moveon.org was a sponsor.**
25 **Planned Parenthood, I believe, was a sponsor. I**

Page 15

1 **mean, they had -- they had many, many sponsors for**
2 **that, for the march.**
3 Q. Do you know if any groups were prohibited
4 from participating in the march?
5 **A. I -- I don't know.**
6 Q. Okay. Do you know who the New Wave
7 Feminists are?
8 **A. I have never heard of the New Wave**
9 **Feminists.**
10 Q. Okay. All right. Now, who -- do you
11 remember if you traveled with any other union
12 members on your way to the march?
13 **A. I mean, I don't remember. We were**
14 **traveling from all over the country, so I don't**
15 **know if anyone else was going from -- I mean, I**
16 **would assume I was flying from -- I would have to**
17 **look back, but I assume I was flying from Denver.**
18 **And I don't know if we -- I don't recall.**
19 Q. Okay. Do -- do you recall whether the --
20 the cabin lights on your flight were turned pink?
21 **A. I don't believe they were, but I -- I**
22 **don't remember. I don't -- I don't think so.**
23 Q. Okay. All right. Now, were the events in
24 -- that took place at the women's march, I guess,
25 covered on Local 556's website?

Page 16

1 **A. I believe a video was posted afterwards.**
2 **I don't know. I don't remember if I -- I typically**
3 **write a communication piece if I -- if we're**
4 **involved in something. I don't remember if I wrote**
5 **a communication piece, but I know there was a video**
6 **posted.**
7 Q. Okay. And what was the video about?
8 **A. It showed some of the pictures from the**
9 **march. And a few of the women from Local 556 who**
10 **participated just spoke briefly about what the**
11 **march meant to them.**
12 Q. Okay. And in the video, what did the
13 different women speak about in terms of what the
14 march meant to them?
15 **A. I think I spoke about government**
16 **representation and how women are underrepresented**
17 **in our -- you know, in Congress. Some -- there was**
18 **-- someone spoke about LGBTQ rights, racial**
19 **equality, women's equality; that's -- that's --**
20 **that's what I remember from the video.**
21 Q. Okay. And you don't remember any of the
22 other contents of the video?
23 **A. There were pictures that we had submitted**
24 **and just little, short statements from women, but**
25 **it was -- but it was a short video. It wasn't -- I**

Page 17

1 **don't believe it was very long at all.**
2 Q. Okay. Do you remember if it was under 10
3 minutes?
4 **A. Oh, definitely under 10 minutes, I would**
5 **think.**
6 Q. Okay.
7 **A. I would think it was less than five**
8 **minutes, probably.**
9 Q. Okay. And the video was posted on TWU
10 556's website?
11 **A. I -- I think it was, yes.**
12 Q. Okay. And did some of the different, I
13 guess, Local 556 members who attended post about
14 the march on their Facebook pages as well?
15 **A. I would imagine that they did, but I don't**
16 **know.**
17 Q. Okay.
18 **A. I believe I did, but I don't know what**
19 **other people did.**
20 **(Exhibit 29 marked.)**
21 Q. (By Mr. Gilliam) Okay. All right. Let's
22 see. If I could direct you to Document 14.
23 **A. 14?**
24 Q. Yes, ma'am.
25 **A. Yes.**

Page 18

1 Q. All right. And if you want to take a
2 minute to review that. And once you've had the
3 chance to look it over, let me know.
4 **A. I mean, do you want me to read the whole**
5 **article or just --**
6 Q. No. Only if you want to; you certainly
7 can. I was just going to ask you some questions
8 about it and I wanted to make sure you had the
9 chance to familiarize yourself with it.
10 **A. Okay.**
11 Q. All right. Do you recognize this?
12 **A. I am assuming this is a TWU International**
13 **publication just by the -- it's not -- it doesn't**
14 **appear to be a 556 publication. It looks like TWU**
15 **International.**
16 Q. Okay. Do you recognize it?
17 **A. I don't remember seeing it. I may have,**
18 **but I don't remember.**
19 Q. Okay. Now, in the first -- I guess, the
20 -- really, the second paragraph that starts, first
21 -- first, women from across the union's staff -- do
22 you see where --
23 **A. Yes. Can you give me one second to get a**
24 **Kleenex? I am sorry.**
25 Q. Sure, sure. Yeah, we can take a quick

Page 19

1 break.
2 MR. GILLIAM: Go off the record real
3 quick.
4 (Off-the-record discussion.)
5 Q. (By Mr. Gilliam) Are you ready? You good
6 to go?
7 **A. Yeah. I am good to go.**
8 Q. Okay. Now, let's see. That -- that, I
9 guess, again, second paragraph where it says the --
10 let's see. Women from across the union's staff and
11 divisions came to Washington, D.C. to participate
12 in the historic women's march on Washington -- and
13 then it continues -- to support women's rights,
14 labor and human rights.
15 And do you -- were you there
16 supporting women's rights?
17 **A. I was.**
18 Q. Okay. And do you think supporting women's
19 rights includes supporting women's reproductive
20 rights?
21 MR. GREENFIELD: And -- and hold on,
22 Matthew. I'm going to object. She's here to
23 testify -- not about her personal views on
24 anything. She's here to testify about TWU -- TWU
25 556's stance on things. So, really, Ms. Parker's

Page 20

1 personal views are not for deposition -- right for
2 deposition today.
3 Q. (By Mr. Gilliam) Well, was the -- were --
4 were you-all there -- were the union members there
5 supporting women's reproductive rights?
6 **A. No.**
7 Q. Okay. Then why -- why were the union
8 members attending?
9 MR. GREENFIELD: Objection.
10 Speculation as to why individuals -- specific
11 people who attended the meeting were attending.
12 You can answer to the best of your ability,
13 Ms. Parker.
14 **A. Knowing the women who went and -- we were**
15 **there for -- I was there because I do not believe**
16 **women are equally represented in leadership**
17 **positions all the way from our Local to city --**
18 **city and state government, all the way up to**
19 **federal government. And women's equality -- and**
20 **that includes racial equality, LGBTQ equality, but**
21 **the main focus was women within their -- within**
22 **their unions.**
23 Q. (By Mr. Gilliam) Okay. And Local 556 was
24 there to support women within their unions?
25 **A. We were there to support, as I said,**

Page 21

1 **women's equality, LGBTQ, racial equality; to foster**
2 **and encourage women to be in leadership positions.**

3 Q. Okay. And was Local 556 there to support
4 women's rights generally?

5 **A. Yes.**

6 Q. Okay. And do women's rights include
7 women's reproductive rights?

8 **A. We were not there in any way, shape or**
9 **form to support or to not support abortion or**
10 **women's reproductive rights.**

11 Q. Okay. Now, in the second column near the
12 top, it talks about the Pregnant Women Fairness
13 Act.

14 **A. Yes.**

15 Q. And was Local 556 there supporting the
16 Pregnant Woman Fairness -- or Women Fairness Act?

17 **A. We discussed this at our meeting and I**
18 **discussed it at other working women's meeting. And**
19 **I believe the -- but, yes, that would be an aspect**
20 **of something that we were there for.**

21 Q. Okay. And then further down, I guess, the
22 second full paragraph, it says -- there is a
23 sentence there that starts, before heading to
24 Capitol Hill -- do you see where I am?

25 **A. Where -- I am sorry, where -- what**

Page 22

1 **paragraph?**

2 Q. It's the one that starts, the WWC meeting
3 started with an all-day intensive how-to-lobby
4 session.

5 **A. Yes.**

6 Q. Okay. And did the Local 556 members
7 attend that meeting during the week of the women's
8 march?

9 **A. I am not sure what this -- because we**
10 **spoke about the Pregnant Women's Fairness Act at**
11 **the meeting. Is this -- I don't know if this is**
12 **referring to --**

13 Q. It says, the WWC meeting started with an
14 all-day intensive how-to-lobby session facilitated
15 by WWC chair and TWU political field representative
16 Gwen York.

17 **A. Okay. But it talks about -- prior to**
18 **that, it talks about TWU International's working**
19 **women's committee meeting held thrice yearly; that**
20 **-- that was not the -- so I don't know if it's**
21 **referring to that meeting or if it's referring to**
22 **the meeting that we had on the 19th. And so --**
23 **because I haven't read through this entire article,**
24 **I believe that that is -- that's referring to the**
25 **-- to the meeting held February 28th through March**

Page 23

1 **2nd.**

2 Q. Okay. And did you attend that meeting?

3 **A. I -- I am sure that I would have, as**
4 **chairperson of the women's committee.**

5 Q. Okay. Now, the week of the women's march,
6 you did attend a meeting during that time, correct?

7 **A. We did. Yes, we held a meeting on the**
8 **19th.**

9 Q. Okay. I am sorry. Was that meeting
10 facilitated by Gwen York also?

11 **A. Gwen York and Audrey Stone facilitated the**
12 **meeting.**

13 Q. Okay. And what was that meeting about?

14 **A. We had Liz Shuler, who is**
15 **secretary/treasurer for the AFL-CIO, came and spoke**
16 **to us. Working America, who is an organization**
17 **that provides a union for people that don't have**
18 **unions on the job, came and spoke with us. And we**
19 **discussed -- it was actually at that time that we**
20 **renamed the women's committee to the -- to the WISE**
21 **committee, Women's Issues Service and Education,**
22 **and discussed what we would like our focus to be as**
23 **a committee.**

24 Q. Okay. Now, was that the meeting where you
25 talked about prioritizing goals?

Page 24

1 **A. I -- I believe that that's referring to**
2 **the February -- is that -- is that under --**

3 Q. Let's see.

4 **A. Where is prioritizing goals?**

5 Q. I am looking for it too. Well, I don't
6 see that, but you said you talked about what the
7 WISE committee would focus on?

8 **A. Yes.**

9 Q. Okay. And what were some of the, I guess,
10 subjects that you-all discussed WISE focusing on?

11 **A. We discussed having, I guess, a point**
12 **person in each domicile that could facilitate**
13 **volunteer activities with a -- with a women's**
14 **group. You know, for example, in Denver, I**
15 **facilitate and volunteer activities with SafeHouse**
16 **Denver, which is a emergency shelter for women --**
17 **or for men; they have men too -- for domestic**
18 **violence. One -- one base -- I think it was**
19 **Los Angeles; I can't remember -- did a book drive**
20 **for women in prison.**

21 **Things like -- so we talked about**
22 **volunteer activities that we could get involved in.**
23 **I believe we discussed sexual harassment and sexual**
24 **assault at work and just things that we thought, as**
25 **a work group and as women and as union women, we**

1 **should address.**
 2 Q. Okay. Now, during -- during that week,
 3 did any of the Local 556 members meet with any
 4 lawmakers?
 5 **A. No, we did not.**
 6 Q. Okay. That was only during the second
 7 meeting?
 8 **A. I believe the things that -- talked about**
 9 **-- legislation is talking about the February 28th**
 10 **meeting.**
 11 Q. Okay. Now, did you participate for Local
 12 556 in that how-to lobbying session they talk about
 13 here?
 14 **A. I don't -- I don't remember.**
 15 Q. Okay. But you think you would have
 16 attended that meeting?
 17 **A. I -- I think that I would have attended**
 18 **that meeting. I am not 100 percent sure, but I**
 19 **think I would have.**
 20 Q. Okay. And it -- it talks about TWU
 21 members being armed with talking points and a
 22 leave-behind flyer. Do you know if you received a
 23 flyer?
 24 **A. I -- I don't recall. I don't recall that.**
 25 Q. Okay. Now, during that week of -- that

1 Q. (By Mr. Gilliam) If I could direct you to
 2 Document 25.
 3 MR. GILLIAM: Go ahead and mark
 4 Document 14 as Exhibit 29.
 5 **A. Okay.**
 6 Q. All right. And do you recognize some of
 7 these pages?
 8 **A. I do.**
 9 Q. Okay. And what are they?
 10 **A. Pictures from the march --**
 11 Q. Okay.
 12 **A. -- and pictures from -- the top picture is**
 13 **the picture after -- either before or after our**
 14 **meeting on the 19th. And I believe the rest are**
 15 **pictures from the march.**
 16 Q. Okay. Now, during the meeting that took
 17 place on the 19th, were there any discussions
 18 involving women's reproductive rights?
 19 **A. No.**
 20 Q. Okay. Were there any discussions about
 21 Planned Parenthood?
 22 **A. No.**
 23 Q. Okay. Now, going back to Document 25. If
 24 I could direct you to -- let's see -- the page at
 25 the bottom that says Carter 1144.

1 all of the Local 556 members there -- were there,
 2 did anyone from Local 556 take part in activities
 3 promoting the Pregnant Women Fairness Act?
 4 **A. No.**
 5 Q. Okay. And was -- in that -- again, during
 6 the -- that meeting that took place in January, did
 7 the women's committee have any discussions about
 8 national right-to-work legislation?
 9 **A. No.**
 10 Q. Okay. All right. And if I could direct
 11 your attention to the second page.
 12 **A. Okay.**
 13 Q. And the picture in the top right-hand
 14 corner. Are there any Local 556 members in that
 15 picture?
 16 **A. No. Oh, gosh, my dogs. Hold, please.**
 17 MR. GREENFIELD: I assumed that was
 18 you, Ed.
 19 MR. GILLIAM: I did too.
 20 MR. CLOUTMAN: I am not the only Hound
 21 of the Baskervilles harbored.
 22 THE WITNESS: No. You be quiet.
 23 Okay. I'm -- Zoom meetings are great. Come here,
 24 buddy. Come here.
 25 (Exhibit 30 marked.)

1 **A. That says -- I am sorry, what?**
 2 Q. Carter 1144.
 3 **A. I don't -- are we on 25?**
 4 MR. GREENFIELD: 25-A, Ms. Parker. It
 5 will be the second document on the second page on
 6 25-A.
 7 **A. Okay. I am on 25-A and I don't see --**
 8 Q. (By Mr. Gilliam) Really small letters in
 9 the bottom right-hand corner.
 10 **A. Okay. I --**
 11 Q. You found it?
 12 **A. It says Carter 1163?**
 13 Q. Do you see one that says 1144?
 14 **A. 1150 -- I think --**
 15 Q. It should be the second page.
 16 **A. Okay. Carter 1144. Sorry. It's tiny.**
 17 Q. No, yeah, yeah, it is very small, so, no.
 18 And do you know who Elizabeth Alexander is?
 19 **A. I do.**
 20 Q. Okay. And who is she?
 21 **A. She's a flight attendant and a member of**
 22 **Local 556.**
 23 Q. Okay. Is she a member of the working
 24 women's committee?
 25 **A. Yes.**

Page 29

Page 31

1 Q. Okay. And is she the person carrying the
2 sign in that picture?

3 **A. Yes.**

4 Q. Okay. And let's see. Going to the next
5 page. And do you recognize any union members in
6 this picture?

7 **A. Yes.**

8 Q. Okay. And who are the union members you
9 recognize in this picture?

10 **A. The far left, I believe, is Angie**
11 **Kilbourne. On the top of Angie's shoulder is**
12 **Audrey Stone. Lori Lochelt is next. I don't know**
13 **who the male is. And -- but then -- I don't -- I**
14 **don't know who that is.**

15 Q. Okay.

16 **A. And then it's Sam Wilkins on the far**
17 **right.**

18 Q. Okay. And do you recognize this banner
19 being carried here?

20 **A. Yes.**

21 Q. Okay. And where did the banner come from?

22 **A. I believe we had it made prior to the**
23 **march.**

24 Q. Okay. And let's see. Let me see. If I
25 can direct you to the next page too.

1 Q. Okay. And all of the women pictured
2 there, are they Local 556 members?

3 **A. Yes.**

4 Q. Okay. All right. And do you know who
5 Allyson Parker-Lauck is?

6 **A. Yes. She's my sister.**

7 Q. Okay. And is she also a Southwest flight
8 attendant?

9 **A. At the time, she was. She's retired.**

10 Q. Okay. Was she also a member of the WISE
11 committee?

12 **A. Yes.**

13 Q. Okay. And she attended the march?

14 **A. She did, yes.**

15 Q. Okay. Do you know who Alexa McCracken is?

16 **A. Yes.**

17 Q. Okay. Is she also a flight attendant?

18 **A. She is, yes.**

19 Q. Okay. And did she also attend the women's
20 march with Local 556?

21 **A. She did, yes.**

22 Q. Okay. All right. Now, at any point, did
23 you learn about the Facebook posts and messages
24 that Charlene Carter sent to Audrey Stone?

25 **A. I knew something had been sent to Audrey**

Page 30

Page 32

1 **A. Okay.**

2 Q. This one -- this is the one that says
3 Carter 1147 at the bottom?

4 **A. Yes.**

5 Q. Okay. And this picture here, was this
6 posted on TWU Local 556's page?

7 **A. This is -- I believe this may be from the**
8 **Facebook page, but it -- it may have been also**
9 **posted on the website. I don't know; I think it**
10 **was.**

11 Q. Okay. And did you share it on your
12 Facebook page?

13 **A. I don't remember.**

14 Q. Okay. And up at the top, it says, Jessica
15 Parker shared TWU Local 556's video; and it says,
16 why we marched.

17 Does that --

18 **A. I didn't remember sharing it. I didn't**
19 **remember sharing it.**

20 Q. Okay. And then if we could go to the next
21 page.

22 **A. Okay.**

23 Q. And was this a -- also a picture you
24 posted on your Facebook page?

25 **A. Yes. It looks like it.**

1 **by Charlene, but I was not aware of the specifics**
2 **of it, what it was. I didn't see any of it.**

3 Q. Okay. And at any point, do you know if
4 anybody on the working women's committee reviewed
5 it?

6 **A. Not to my knowledge, but I don't know.**

7 Q. Okay. All right. Now, did the -- outside
8 of the women's march, did the -- well, let me ask
9 this: Back pre-COVID, where -- well, did the
10 working women's committee hold meetings --
11 committee meetings?

12 **A. The International working women's**
13 **committee?**

14 Q. No. The Local.

15 **A. We did not. We had -- well, we had**
16 **conference call meetings, yes. But it's been quite**
17 **a while since we've done that.**

18 Q. Okay. And, I guess, at any point, were
19 you having regular conference call meetings?

20 **A. We had them -- we had several after we**
21 **kind of restructured the committee and renamed the**
22 **committee. I don't know if they would be regular.**
23 **We attempted to have meetings and it was just --**
24 **logistically, it was -- it was difficult because**
25 **we're all over the country.**

Page 33

1 Q. Okay. All right. Okay. Let's see.

2 MR. GILLIAM: I think that's all I
3 have. Can I just take -- go off the record?

4 MR. GREENFIELD: Okay.
5 (Recess taken.)

6 Q. (By Mr. Gilliam) Okay. Now, Ms. Parker,
7 at the meeting you-all held during the women's
8 march, did you knit some of the pink hats that are
9 depicted in some of the pictures?

10 **A. Did I knit them?**

11 Q. Did members knit them?

12 **A. I -- yes, I think that some people were
13 knitting them.**

14 Q. Okay. Okay. And those are called the
15 pink pussy hats, correct?

16 **A. They are.**

17 Q. Okay. Do you know what they signify?

18 **A. It was a play on Trump saying he can grab
19 them by the pussy and there is nothing they can do
20 about it.**

21 Q. Okay. Those -- those hats were a play
22 specifically on Trump?

23 **A. They were a play on what he said and how
24 -- and just that -- that type of language towards
25 women.**

Page 34

1 Q. Okay. All right. And, of course, I lost
2 my place here.

3 Now, did you see -- during the women's
4 march, did you see anyone protesting against
5 abortion?

6 **A. I -- I believe so. I think there were --
7 no, I know there were people.**

8 Q. Okay. And were they carrying signs that
9 depicted aborted fetuses?

10 **A. I don't recall that.**

11 Q. Okay. Do you recall them carrying any
12 signs?

13 **A. I don't recall the specifics of their
14 signs.**

15 Q. Okay. All right. And I think I have you
16 on this topic here. Now, are you familiar with the
17 union's communications about Ms. Carter's social
18 media activity?

19 **A. No.**

20 Q. Okay.

21 MR. GREENFIELD: And, I think,
22 Matthew, you are talking about Number 9?

23 MR. GILLIAM: Yeah.

24 MR. GREENFIELD: Yeah. We had brought
25 up Jessica potentially being someone for the --

Page 35

1 discussing the recall effort as part of Number 9
2 and 12, if that was the other one. I -- I think
3 she probably could, but we -- we do have Donna
4 Keith ready and prepared to talk on -- more
5 substantively on those two topics.

6 MR. GILLIAM: Okay. She's prepared on
7 9 and 12?

8 MR. GREENFIELD: Donna Keith?

9 MR. GILLIAM: Yeah.

10 MR. GREENFIELD: Well, as -- 12 in
11 relationship to the recall effort. And as far as
12 9, anything related to Ms. Carter's involvement in
13 the recall effort, to the degree she's aware of it.

14 MR. GILLIAM: Okay. Well, I'll --
15 I'll ask.

16 Q. (By Mr. Gilliam) Ms. Parker, do you have
17 any knowledge of Ms. Carter's involvement in the
18 recall effort?

19 **A. No.**

20 Q. Okay. All right.

21 MR. GILLIAM: And I -- I will release
22 you. I am done.

23 THE WITNESS: Okay.

24 MR. CLOUTMAN: Thank you, Jessica.

25 THE WITNESS: Thanks, Ed. Thanks,

Page 36

1 Adam.

2 MR. GREENFIELD: Thank you,
3 Ms. Parker. Have a good day.

4 THE REPORTER: Mr. Greenfield, are you
5 wanting me to send you the originals for them to
6 read and sign on all of these?

7 MR. GREENFIELD: Yes, ma'am.

8 (End of Proceedings, 5:14 p.m.)
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Page 37

1 CHANGES AND SIGNATURE
2 WITNESS NAME: JESSICA PARKER
3 DATE OF DEPOSITION: NOVEMBER 30, 2020
4 PAGE LINE CHANGEREASON

5 _____
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Page 39

1 REPORTER'S CERTIFICATION
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE NORTHERN DISTRICT OF TEXAS
4 DALLAS DIVISION
5 CHARLENE CARTER)
6)
7) CIVIL ACTION NO.
8 VS.) 3:17-CV-02278-X
9)
10)
11) SOUTHWEST AIRLINES CO., AND)
12) TRANSPORT WORKERS UNION OF)
13) AMERICA, LOCAL 556)

14 -----
15 CONFIDENTIAL
16 TWU LOCAL 556 30(b)(6)
17 ORAL DEPOSITION OF
18 JESSICA PARKER
19 NOVEMBER 30, 2020
20 -----

21 I, CHARIS M. HENDRICK, Certified Shorthand
22 Reporter in and for the State of Texas, do hereby
23 certify to the following:
24 That the witness, JESSICA PARKER, was by
25 me duly sworn and that the transcript of the oral
deposition is a true record of the testimony given
by the witness.
I further certify that pursuant to Federal
Rules of Civil Procedure, Rule 30(e)(1)(A) and (B)
as well as Rule 30(e)(2), that review of the
transcript and signature of the deponent:

Page 38

1 I, JESSICA PARKER, have read the foregoing
2 deposition and hereby affix my signature that same
3 is true and correct, except as noted above.
4

5 _____
6 JESSICA PARKER

7 THE STATE OF _____
8 COUNTY OF _____

9 Before me, _____, on this day
10 personally appeared JESSICA PARKER, known to me (or
11 proved to me under oath or through _____) to
12 be the person whose name is subscribed to the
13 foregoing instrument and acknowledged to me that
14 they executed the same for the purposes and
15 consideration therein expressed.

16 Given under my hand and seal of office this _____
17 day of _____, 2020.

18 NOTARY PUBLIC IN AND FOR THE
19 STATE OF _____

20 MY COMMISSION EXPIRES: _____
21
22
23
24
25

Page 40

1 ____xx__ was requested by the deponent and/or a
2 party before completion of the deposition.
3 ____ was not requested by the deponent and/or
4 a party before the completion of the deposition.

5 I further certify that I am neither
6 attorney nor counsel for, nor related to or
7 employed by any of the parties to the action in
8 which this deposition is taken and further that I
9 am not a relative or employee of any attorney of
10 record in this cause, nor am I financially or
11 otherwise interested in the outcome of the action.

12 The amount of time used by each party at
13 the deposition is as follows:
14 Mr. Gilliam - 50 minutes

15
16 Subscribed and sworn to on this 8th day of
17 December, 2020.

18
19
20 
21 CHARIS M. HENDRICK, CSR # 3469
22 Certification Expires: 10-31-21
23 Bradford Court Reporting, LLC
24 7015 Mumford Street
25 Dallas, Texas 75252
Telephone 972-931-2799
Facsimile 972-931-1199
Firm Registration No. 38

A			C	
ability 20:12	Angie's 29:11	Audrey 8:11,15	C 2:1	CLOUTMAN
aborted 34:9	answer 20:12	9:4,16,19	cabin 15:20	2:14,15 26:20
abortion 21:9	ANSWERS 1:16	23:11 29:12	call 32:16,19	35:24
34:5	anybody 5:10	31:24,25	called 6:1 33:14	Coalition 14:5
above-styled	32:4	authorization	capacity 4:20	Colorado 1:22
1:18	apart 4:25 5:9	9:5,8 10:21,22	7:21	4:8
acknowledged	5:12	authorize 13:20	Capitol 21:24	column 21:11
38:11	appear 18:14	authorized	carried 29:19	come 12:4 26:23
Act 21:13,16	Appearances	13:23	carrying 29:1	26:24 29:21
22:10 26:3	3:2	aware 32:1	34:8,11	comes 13:6
action 1:4 3:12	appeared 38:9	35:13	Carter 1:3 2:19	COMMISSION
39:5 40:7,11	approval 9:9,12		27:25 28:2,12	38:20
activities 24:13	9:15	B	28:16 30:3	committee 5:14
24:15,22 26:2	armed 25:21	B 2:3,14 39:23	31:24 39:4	5:19,20 6:7 7:3
activity 34:18	ARMSTRONG	back 15:17	Carter's 34:17	7:23,25 8:1,4
Adam 2:14 36:1	2:19	27:23 32:9	35:12,17	14:2 22:19
additional 7:7	arrange 10:24	banner 29:18,21	cause 1:19 40:10	23:4,20,21,23
address 25:1	11:11	base 24:18	certainly 18:6	24:7 26:7
addressing 5:4	arranged 9:8,9	Baskervilles	Certificate 3:7	28:24 31:11
administering	11:12	26:21	Certification	32:4,10,11,13
4:10	article 3:12 18:5	behalf 4:19	39:1 40:21	32:21,22
affix 38:1	22:23	believe 6:10	Certified 1:20	communicated
AFL-CIO 14:6	asked 9:7	8:17 9:19,24	39:15	8:13
23:15	asking 10:25	11:4,13,20	certify 39:17,22	communication
afternoon 4:18	aspect 14:17	14:25 15:21	40:5	16:3,5
agenda 8:19,21	21:19	16:1 17:1,18	chair 6:7 14:2	communicatio...
8:24	assault 24:24	20:15 21:19	22:15	5:10 8:14
ago 9:20	assume 15:16,17	22:24 24:1,23	chairperson	13:16,18 34:17
agreenfield@c...	assumed 26:17	25:8 27:14	5:18,19 23:4	company 8:5
2:17	assuming 11:14	29:10,22 30:7	chance 18:3,9	13:2,12
ahead 27:3	13:12 18:12	34:6	changed 11:20	completion 40:2
AIRLINES 1:5	attached 1:25	best 20:12	CHANGERE...	40:4
2:7 39:6	attempted 32:23	blank 13:2	37:4	conducted 4:5
Alexa 31:15	attend 10:3,21	board 5:23,25	Changes 3:6	conference
Alexander 28:18	10:22,23 11:2	7:8 10:17,18	37:1	32:16,19
all-day 22:3,14	11:3 22:7 23:2	book 24:19	Charis 1:20 4:9	CONFIDENT...
allocated 7:3,12	23:6 31:19	bottom 27:25	39:15 40:20	1:9 39:10
Allyson 31:5	attendant 28:21	28:9 30:3	Charlene 1:3	Confirmed 3:10
America 1:6	31:8,17	Braddock 2:4	2:19 31:24	Congress 16:17
2:13 23:16	attended 17:13	Bradford 40:21	32:1 39:4	consideration
39:7	20:11 25:16,17	break 19:1	check 9:19	38:12
amount 40:12	31:13	briefly 16:10	city 20:17,18	contents 16:22
and/or 40:1,3	attending 9:23	brought 34:24	Civil 1:4,23 39:5	continues 19:13
Angeles 24:19	20:8,11	buddy 26:24	39:23	coordinated
Angie 29:10	attention 26:11	budget 7:3,14	close 10:1	8:16,19
	attorney 40:6,9	business 3:10		corner 26:14
		9:12,16 13:10		

28:9 correct 6:16 7:4 8:1 23:6 33:15 38:2 CORRELL 2:8 counsel 4:25 5:9 5:12 40:6 country 15:14 32:25 County 4:12 38:7 course 34:1 Court 1:1 4:9 39:2 40:21 covered 15:25 COVID-19 1:24 4:6 CSR 4:10 40:20 current 1:23 4:6	5:3,11 20:1,2 37:3 38:1 39:11,20 40:2 40:4,8,13 different 16:13 17:12 difficult 32:24 direct 17:22 26:10 27:1,24 29:25 Disaster 1:24 4:7 discussed 21:17 21:18 23:19,22 24:10,11,23 discussing 35:1 discussion 19:4 discussions 26:7 27:17,20 DISTRICT 1:1 1:1 39:2,2 DIVISION 1:2 39:3 divisions 19:11 document 3:11 3:13 5:3 11:24 12:7 17:22 27:2,4,23 28:5 documents 3:15 4:23 5:7 dogs 26:16 doing 6:10 domestic 24:17 domicile 5:23 24:12 Donna 35:3,8 drive 24:19 duly 4:15 39:19	35:18 either 11:12 27:13 Elizabeth 28:18 Ellis 4:12 Elm 2:15 emailed 9:18 11:21 12:3 emails 12:4 emergency 1:23 4:6 24:16 employed 40:7 employee 11:21 40:9 encourage 21:2 ended 9:22 entire 22:23 equality 16:19 16:19 20:19,20 20:20 21:1,1 equally 20:16 event 8:9 9:3,6 14:3 events 8:25 15:23 exactly 9:21 11:6 Examination 3:4 4:16 example 24:14 Excuse 5:2 executed 38:11 executive 5:23 5:25 7:8 Exhibit 3:10,12 3:14 11:25 12:10 17:20 26:25 27:4 EXHIBITS 3:9 Expires 38:20 40:21 expressed 10:6,7 38:12	30:24 31:23 facilitate 24:12 24:15 facilitated 7:19 22:14 23:10,11 facilitating 9:10 Facsimile 40:23 Fairness 21:12 21:16,16 22:10 26:3 familiar 34:16 familiarize 18:9 far 29:10,16 35:11 February 22:25 24:2 25:9 federal 1:22 20:19 39:22 Feminists 15:7,9 fetuses 34:9 field 22:15 filling 13:16 financially 40:10 Firm 40:24 first 4:15 18:19 18:20,21 five 17:7 flight 15:20 28:21 31:7,17 flyer 25:22,23 flying 15:16,17 focus 20:21 23:22 24:7 focused 14:17 focusing 24:10 following 39:17 follows 4:15 40:13 foregoing 38:1 38:11 form 3:10 13:2,6 13:9 21:9 forms 11:9,18 12:18,20 13:8 13:16,19	foster 21:1 found 10:17 28:11 FOUNDATION 2:4 four 6:8,11 9:20 full 21:22 funds 7:11 further 21:21 39:22 40:5,8
D D.C 8:10 19:11 Dallas 1:2 2:10 2:16 39:3 40:22 date 4:2 37:3 dates 11:15,22 day 36:3 38:9,14 40:16 DEBM 6:1,3 deceased 7:18 December 40:17 decide 10:2 decided 8:8 DEFENDANT 2:7,12 DEFENSE 2:3 definitely 17:4 degree 35:13 Denver 5:23,25 15:17 24:14,16 depicted 33:9 34:9 deponent 39:25 40:1,3 deposition 1:10 1:16 4:4,11,22	E E 2:1,1 ecloutman@la... 2:17 Ed 26:18 35:25 Education 23:21 EDWARD 2:14 effort 35:1,11,13	F Facebook 3:14 17:14 30:8,12	G generally 21:4 generated 13:12 generates 13:2 getting 10:21 Gilliam 2:3 3:4 4:17 12:8,12 17:21 19:2,5 20:3,23 26:19 27:1,3 28:8 33:2,6 34:23 35:6,9,14,16 35:21 40:14 give 18:23 given 38:14 39:20 go 8:10 19:2,6,7 27:3 30:20 33:3 goals 23:25 24:4 goes 13:11 going 5:4 10:6,8 10:9,16 15:15 18:7 19:22 27:23 29:4 good 4:18 19:5,7 36:3 gosh 26:16 government 16:15 20:18,19 grab 33:18 great 26:23 Greenfield 2:14 2:15 12:2 19:21 20:9 26:17 28:4	

33:4 34:21,24 35:8,10 36:2,4 36:7 group 24:14,25 groups 14:7,8,9 14:12,16 15:3 guess 6:19,22 7:8 8:9,25 9:25 10:1,2,24 11:2 11:10,25 13:24 15:24 17:13 18:19 19:9 21:21 24:9,11 32:18 Gwen 7:18 22:16 23:10,11	human 19:14 <hr/> I idea 6:18 14:11 III 2:14 imagine 13:17 17:15 important 14:3 include 21:6 includes 19:19 20:20 INDEX 3:1 individuals 20:10 initially 9:18 instance 1:17 instrument 38:11 intensive 22:3 22:14 interest 10:6,7 13:25 interested 40:11 International 7:16,20,22 8:17 9:2 18:12 18:15 32:12 International's 22:18 invite 10:3 involved 6:15 7:16 10:5 14:4 14:7,9,13 16:4 24:22 involvement 7:21 35:12,17 involving 27:18 Issues 23:21 items 5:4 <hr/> J January 6:16 8:17,18 26:6 Jessica 1:10,16 3:3 4:4,14 12:2 30:14 34:25 35:24 37:2	38:1,5,9 39:11 39:18 job 23:18 John 9:18 11:5 12:22 joint 8:3 JP 11:14 <hr/> K Keith 35:4,8 Kilbourne 29:11 kind 6:25 32:21 Kleenex 18:24 knew 10:16 31:25 knit 33:8,10,11 knitting 33:13 know 5:13 7:15 7:20 9:7,13 10:20 11:5,6 12:21,23,25 13:1,4,7,11,11 13:14,20,22 14:9,12,14,16 14:18 15:3,5,6 15:15,18 16:2 16:5,17 17:16 17:18 18:3 22:11,20 24:14 25:22 28:18 29:12,14 30:9 31:4,15 32:3,6 32:22 33:17 34:7 Knowing 20:14 knowledge 32:6 35:17 known 38:9 <hr/> L labor 14:5,7,8 19:14 language 33:24 Laughlin 4:8 LAUREN 2:19 LAW 2:15 lawmakers 25:4	leadership 20:16 21:2 learn 6:22 10:8 31:23 learned 6:25 leave-behind 25:22 left 29:10 legal 2:3 4:25 5:9,12 legislation 25:9 26:8 let's 11:23 17:21 19:8,10 24:3 27:24 29:4,24 33:1 letters 28:8 LGBTQ 16:18 20:20 21:1 lights 15:20 LINE 37:4 little 16:24 Liz 23:14 LLC 40:21 LLP 2:9 lobbying 25:12 Local 1:6,9 2:13 3:14 4:20 5:15 5:22 6:19 8:9 10:8 14:1,4 15:25 16:9 17:13 20:17,23 21:3,15 22:6 25:3,11 26:1,2 26:14 28:22 30:6,15 31:2 31:20 32:14 39:7,10 located 1:21 4:7 Lochelt 29:12 lodging 8:20 10:24 logistically 32:24 long 6:3,6 12:14 17:1	look 11:24 12:6 15:17 18:3 looking 12:5 24:5 looks 18:14 30:25 Lori 29:12 Los 24:19 lost 34:1 lot 14:16,20 Loveland 1:22 <hr/> M M 1:20 39:15 40:20 ma'am 12:8 17:24 36:7 main 20:21 male 29:13 march 6:16,20 6:23 7:7,12,13 7:16 8:11,15 8:18 9:23 10:3 10:9,23 14:1,7 14:10,13,18 15:2,4,12,24 16:9,11,14 17:14 19:12 22:8,25 23:5 27:10,15 29:23 31:13,20 32:8 33:8 34:4 marched 30:16 mark 11:24 27:3 marked 12:10 17:20 26:25 math 6:10 Matthew 2:3 19:22 34:22 mbg@nrtw.org 2:6 McCracken 31:15 mcorrell@ree... 2:11 mean 6:25 13:9 14:14,16 15:1
---	--	---	---	---

15:13,15 18:4 means 4:12 meant 16:11,14 media 7:1 34:18 meet 25:3 meeting 7:19 8:16,19,20,22 9:2,11 20:11 21:17,18 22:2 22:7,11,13,19 22:21,22,25 23:2,6,7,9,12 23:13,24 25:7 25:10,16,18 26:6 27:14,16 33:7 meetings 26:23 32:10,11,16,19 32:23 member 5:24 6:1 28:21,23 31:10 members 8:10 9:22 10:12,17 10:19 11:1 15:12 17:13 20:4,8 22:6 25:3,21 26:1 26:14 29:5,8 31:2 33:11 memory 9:24 11:11 men 24:17,17 messages 31:23 MICHAEL 2:8 minute 18:2 minutes 17:3,4,8 40:14 money 7:8 moveon.org 14:24 Mumford 40:22	names 11:21 national 2:3 14:23 26:8 Nationwide 3:12 near 21:11 needed 11:15 neither 40:5 never 15:8 New 15:6,8 North 2:9 NORTHERN 1:1 39:2 NOTARY 38:17 noted 38:2 November 1:11 1:19 4:3 37:3 39:12 number 11:15 11:22 34:22 35:1 numbered 1:18 numbers 11:21	16:7,12,21 17:2,6,9,12,17 17:21 18:10,16 18:19 19:8,18 20:7,23 21:3,6 21:11,21 22:6 22:17 23:2,5,9 23:13,24 24:9 25:2,6,11,15 25:20,25 26:5 26:10,12,23 27:5,9,11,16 27:20,23 28:7 28:10,16,20,23 29:1,4,8,15,18 29:21,24 30:1 30:5,11,14,20 30:22 31:1,4,7 31:10,13,15,17 31:19,22 32:3 32:7,18 33:1,1 33:4,6,14,14 33:17,21 34:1 34:8,11,15,20 35:6,14,20,23 once 18:2 operated 7:14 oral 1:10 39:11 39:19 order 1:23 4:6 7:8 11:3,9 organization 14:23 23:16 organizations 14:6 organize 9:5 originals 36:5 outcome 40:11 outside 32:7	30:12,21,24 37:4 pages 17:14 27:7 pairing 11:15,22 paragraph 18:20 19:9 21:22 22:1 Parenthood 14:25 27:21 Parker 1:10,16 3:3 4:4,14,18 20:13 28:4 30:15 33:6 35:16 36:3 37:2 38:1,5,9 39:11,18 Parker's 19:25 Parker-Lauck 31:5 Parrott 9:18 11:5 12:22 part 26:2 35:1 participate 7:9 8:11 10:9 14:1 19:11 25:11 participated 16:10 participating 15:4 participation 6:15,19 7:13 9:5 particular 11:9 11:18 parties 40:7 party 40:2,4,12 people 10:16 11:11,14,18 17:19 20:11 23:17 33:12 34:7 percent 25:18 person 24:12 29:1 38:10 personal 4:20 19:23 20:1	personally 10:13 38:9 phone 12:6 picture 26:13,15 27:12,13 29:2 29:6,9 30:5,23 pictured 31:1 pictures 16:8,23 27:10,12,15 33:9 piece 16:3,5 pink 15:20 33:8 33:15 place 7:1 9:4 15:24 26:6 27:17 34:2 Plaintiff 1:18 2:2 plan 6:19 7:12 8:9 Planned 14:25 27:21 planning 6:15 7:6 8:19 play 33:18,21,23 please 26:16 PLLC 2:15 point 24:11 31:22 32:3,18 points 25:21 political 22:15 positions 5:15 5:17,21 20:17 21:2 post 17:13 posted 16:1,6 17:9 30:6,9,24 posts 3:14 31:23 potentially 34:25 pre-COVID 32:9 Pregnant 21:12 21:16 22:10 26:3 preparation
N N 2:1 name 4:9 37:2 38:10	O oath 4:11 38:10 object 19:22 Objection 20:9 Off-the-record 19:4 office 38:14 OFFICES 2:15 Oh 12:14 14:20 17:4 26:16 okay 4:22,25 5:5 5:9,13,21,25 6:3,6,9,14,18 6:22 7:2,6,11 7:15,22,25 8:3 8:8,21,24 9:3 9:15,22 10:2 10:12,20 11:8 11:17,23 12:9 12:11,17,21 13:1,5,7,7,15 13:19,24 14:8 14:12,21 15:6 15:10,19,23	P P 2:1,1 p.m 1:19 4:3 36:8 page 26:11 27:24 28:5,15 29:5,25 30:6,8	percent 25:18 person 24:12 29:1 38:10 personal 4:20 19:23 20:1	

4:23 5:11 prepared 35:4,6 PRESENT 2:19 prior 4:22 9:3 22:17 29:22 prioritizing 23:25 24:4 prison 24:20 probably 10:17 11:6 17:8 35:3 Procedure 1:23 39:23 Proceedings 4:1 36:8 process 13:22 produced 1:17 prohibited 15:3 promoting 26:3 protesting 34:4 proved 38:10 provides 23:17 provisions 1:25 PUBLIC 38:17 publication 18:13,14 pull 12:13 pulled 11:2,10 11:16 pulls 11:5,7 purposes 38:11 pursuant 1:22 39:22 pussy 33:15,19	36:6 38:1 ready 19:5 35:4 real 19:2 realize 4:19 really 18:20 19:25 28:8 recall 10:10 15:18,19 25:24 25:24 34:10,11 34:13 35:1,11 35:13,18 received 5:2 25:22 Recess 33:5 recognize 12:12 12:16 18:11,16 27:6 29:5,9,18 recommended 9:19 record 1:25 19:2 33:3 39:20 40:10 REED 2:9 referring 22:12 22:21,21,24 24:1 regarding 1:24 4:6 Registration 40:24 regular 32:19,22 related 35:12 40:6 relationship 35:11 relative 40:9 release 35:21 remember 6:24 9:13,17,17,21 10:15 13:15,18 14:21 15:11,13 15:22 16:2,4 16:20,21 17:2 18:17,18 24:19 25:14 30:13,18 30:19	remotely 4:5,11 renamed 23:20 32:21 Reporter 1:20 4:2,10 12:1 36:4 39:16 Reporter's 3:7 39:1 reporting 4:11 40:21 representation 16:16 representative 22:15 represented 20:16 reproductive 19:19 20:5 21:7,10 27:18 request 3:10 11:2 12:18,20 13:10,21 requested 40:1,3 requests 12:15 rest 27:14 restructured 32:21 retired 31:9 review 4:23 18:2 39:24 reviewed 32:4 right 2:3 6:6,10 6:14 13:24 15:10,23 17:21 18:1,11 20:1 26:10 27:6 29:17 31:4,22 32:7 33:1 34:1 34:15 35:20 right-hand 26:13 28:9 right-to-work 26:8 rights 16:18 19:13,14,16,19 19:20 20:5	21:4,6,7,10 27:18 Road 2:4 rough 9:25 Rule 39:23,24 Rules 1:22 39:23 <hr/> S <hr/> S 2:1 SafeHouse 24:15 Sam 29:16 saying 33:18 says 13:10 19:9 21:22 22:13 27:25 28:1,12 28:13 30:2,14 30:15 scholarship 5:18 seal 38:14 second 6:5 18:20 18:23 19:9 21:11,22 25:6 26:11 28:5,5 28:15 secretary/trea... 23:15 see 11:23 17:22 18:22 19:8,10 21:24 24:3,6 27:24 28:7,13 29:4,24,24 32:2 33:1 34:3 34:4 seeing 18:17 send 36:5 sent 31:24,25 sentence 21:23 serves 9:24 11:11 Service 23:21 session 22:4,14 25:12 sexual 24:23,23 shape 21:8 share 30:11 shared 30:15	sharing 30:18 30:19 shelter 24:16 short 16:24,25 Shorthand 1:20 39:15 shoulder 29:11 showed 10:5 16:8 Shuler 23:14 sign 29:2 36:6 signature 3:6 37:1 38:1 39:25 signify 33:17 signs 34:8,12,14 sister 31:6 six 6:4 small 28:8,17 SMITH 2:9 social 7:1 34:17 sorry 12:15 18:24 21:25 23:9 28:1,16 Southwest 1:5 2:7 8:4 13:20 31:7 39:6 speak 16:13 specific 20:10 specifically 6:24 33:22 specifics 32:1 34:13 Speculation 20:10 spoke 16:10,15 16:18 22:10 23:15,18 sponsor 14:24 14:24,25 sponsors 14:19 14:20,22 15:1 Springfield 2:5 staff 18:21 19:10 stance 19:25 started 22:3,13
--	---	---	--	--

starts 18:20 21:23 22:2	40:8	top 12:19 21:12 26:13 27:12 29:11 30:14	union's 6:15 9:5 18:21 19:10 34:17	39:18,21
state 1:21,24 4:7 20:18 38:7,18 39:16	talk 8:11 25:12 35:4	topic 34:16	unions 14:4 20:22,24 23:18	Woman 21:16
stated 1:25	talked 23:25 24:6,21 25:8	topics 35:5	UNITED 1:1 39:2	women 3:12 10:4,7 14:5,23 16:9,13,16,24 18:21 19:10 20:14,16,21,24 21:2,12,16 24:16,20,25,25 26:3 31:1 33:25
statements 16:24	talking 25:9,21 34:22	transcript 39:19 39:25	use 9:11	women's 5:20 6:7,16,23 7:3,7 7:16,23,25 8:3 8:15 9:23 10:9 14:1,2,18 15:24 16:19 19:12,13,16,18 19:19 20:5,19 21:1,4,6,7,10 21:18 22:7,10 22:19 23:4,5 23:20,21 24:13 26:7 27:18 28:24 31:19 32:4,8,10,12 33:7 34:3
STATES 1:1 39:2	talks 21:12 22:17,18 25:20	transpired 10:11	V	work 2:3 11:12 11:13 24:24,25
stenographic 4:12	Telephone 40:23	TRANSPORT 1:6 2:12 39:7	video 16:1,5,7 16:12,20,22,25 17:9 30:15	WORKERS 1:6 2:12 39:7
Stone 8:12,15 9:4,16 23:11 29:12 31:24	term 6:5	travel 3:10 9:9 9:12,16 12:15 12:18,19,20 13:10,21	views 19:23 20:1	working 6:7 7:2 7:3,23,25
Street 2:15 40:22	testified 4:15	traveled 15:11	violence 24:18	
strictly 8:1	testify 19:23,24	traveling 12:16 15:14	Virginia 2:5	
subjects 24:10	testifying 4:19	trip 11:4,14	volunteer 24:13 24:15,22	
submit 11:18	testimony 39:20	true 38:2 39:20	VS 1:4 39:5	
submitted 11:9 11:13,17 12:21 12:24,24 13:19 16:23	Texas 1:1,21 2:10,16 4:13 39:2,16 40:22	Trump 33:18,22	W	
Subpoena 5:2	Thank 35:24 36:2	turned 15:20	want 5:13 18:1,4 18:6	
subscribed 38:10 40:16	Thanks 35:25 35:25	two 35:5	wanted 8:9 11:1 18:8	
substantively 35:5	things 11:20 19:25 24:21,24 25:8	TWU 1:9 3:12 3:14 5:15 7:19 8:17 9:2 17:9 18:12,14 19:24 19:24 22:15,18 25:20 30:6,15 39:10	wanting 36:5	
Suite 2:4,9	think 9:18 10:14 11:21 14:24 15:22 16:15 17:5,7,11 19:18 24:18 25:15,17,19 28:14 30:9 33:2,12 34:6 34:15,21 35:2	type 33:24	Washington 8:10 19:11,12	
support 19:13 20:24,25 21:3 21:9,9	thought 14:3 24:24	typically 16:2	wasn't 16:25	
supporting 19:16,18,19 20:5 21:15	thrice 22:19	U	Wave 15:6,8	
sure 14:15 18:8 18:25,25 22:9 23:3 25:18	time 4:3 11:19 23:6,19 31:9 40:12	underreprese... 16:16	way 7:17 11:19 15:12 20:17,18 21:8	
sworn 4:15 39:19 40:16	tiny 28:16	understand 10:24 14:15	we're 16:3 32:25	
T	titled 12:19	union 1:6 2:12 3:10 5:14 8:1,4 9:12,15,22 10:5,12 11:1 13:2,8,9,10,13 14:5,6,17 15:11 20:4,7 23:17 24:25 29:5,8 39:7	we've 32:17	
take 3:12 18:1 18:25 26:2 33:3	today 4:19 20:2		website 15:25 17:10 30:9	
taken 1:18 33:5	Today's 4:2		week 8:25 22:7 23:5 25:2,25	
			went 10:17,21 20:14	
			Wilkins 29:16	
			WISE 23:20 24:7,10 31:10	
			witness 1:17,21 4:7 12:5 26:22 35:23,25 37:2	
			X	
			xx 40:1	
			Y	

yeah 12:5 18:25 19:7 28:17,17 34:23,24 35:9	25(b) 3:15 28 3:10 9:25 11:25 12:10	17:10 19:25 30:6,15		
yearly 22:19	2850 2:9	6		
years 6:4,5,8,11 9:20	28th 22:25 25:9	600 2:4		
York 7:18 22:16 23:10,11	29 3:12 17:20 27:4	680-4264 2:10		
you-all 20:4 24:10 33:7	2nd 23:1	7		
Z	3	7015 40:22		
Zoom 26:23	3:17-CV-0227... 1:4 39:5	703 2:5		
0	30 1:11,19 3:14 3:14 4:3 26:25	75201 2:10		
1	37:3 39:12	75226 2:16		
10 17:2,4	30(b)(6) 1:9 4:4 39:10	75252 40:22		
10-31-21 40:21	30(e)(1)(A) 39:23	770-3339 2:5		
100 25:18	30(e)(2) 39:24	8		
1144 27:25 28:2 28:13,16	3301 2:15	8001 2:4		
1147 30:3	3469 4:10 40:20	8th 40:16		
1150 28:14	37 3:6	9		
1163 28:12	38 40:24	9 34:22 35:1,7 35:12		
12 3:10 35:2,7 35:10	39 3:7	939-9223 2:16		
14 3:13 17:22,23 27:4	4	972-931-1199 40:23		
1500 2:9	4 3:4	972-931-2799 40:23		
17 3:12	4:13 1:19 4:3			
19th 8:18 22:22 23:8 27:14,17	41 3:11 11:24 12:7			
2	469 2:10			
2 3:2	5			
2016 6:12,13	5:14 36:8			
2017 6:16	50 40:14			
2020 1:11,19 4:3 37:3 38:14 39:12 40:17	556 1:6,9 2:13 3:14 4:20 5:15 5:22 8:10 10:8 14:1 16:9 17:13 18:14 20:23 21:3,15 22:6 25:3,12 26:1,2,14 28:22 31:2,20 39:7,10			
214 2:16	556's 6:19 15:25			
21st 8:18				
22160 2:5				
25 27:2,23 28:3				
25-A 28:4,6,7				
25(a) 3:15				